

CORRES. CONTROL
OUTGOING LTR. NO.
DOE ORDER # 4700.1
03-RF-00155

DIST.	LTR	ENC
METER, T.		
ERRERA, D.W.		
ERRI, M.S.		
INDSAY, D.		
YLE, J.		
MARTINEZ, L.A.		
ARKER, A.		
OWERS, K.		
SHELTON, D.C.	X	
PEARS, M.S.		
PRICE, K.D.		
TUOR, N.R.		
AGUILAR, P.		
ALBIN, C.		
AUBLE, M.		
BEAN, C.		
BUTLER, J.L.		
CERCLA AR (T130G)		
CLARK, D.		
DIETERLE, S.		
FRANCIS, M.		
FREIBOTH, C.		
GIBBS, F.		
GUTHRIE, V.		
HUMISTON, T.		
KEHLER, K.		
MARSCHALL, J.R.	X	
MARTIN, D.		
MYERS, K.		
NESTA, S.	X	X
NORTH, K.		
OLIVER, R.		
OMAN, K.		
PLAPPERT, R.		
PRIMROSE, A.		
ROSENMAN, A.	X	X
SNYDER, D.P.		
THOMPSON, J.		
VANDERPOEL, M.	X	X
WIEMELT, K.	X	
WILLIAMS, L.		
CORRES. CONTROL	X	X
ADMIN RECD/T130G		
TRAFFIC		
FATS/130		

CLASSIFICATION:

UCNI	
UNCLASSIFIED	X X
CONFIDENTIAL	
SECRET	

AUTHORIZED CLASSIFIER

SIGNATURE: _____
DOCUMENT CLASSIFICATION REVIEW WAIVER PER _____
DECLASSIFICATION OFFICE _____
IN REPLY TO RFP CC NO.:

ACTION ITEM STATUS:
☐ PARTIAL/OPEN
☐ CLOSED

LTR APPROVALS:

ORIG. & TYPIST INITIALS:
KLM:pvt



January 29, 2003

03-RF-00155

Mr. Joe Schieffelin
Permitting and Compliance Unit Leader
Federal Facilities Program
Hazardous Materials and Waste Management Division
Colorado Department of Public Health and the Environment
4300 Cherry Creek Drive South
Denver, Colorado 80246-1530

CLOSURE SUMMARY REPORT FOR CLOSURE OF RCRA UNIT 13 IN BUILDING 884
SMN-006-03

Dear Mr. Schieffelin:

Pursuant to the *RFCA Standard Operating Protocol (RSOP) for Facility Component Removal, Size Reduction, & Decontamination Activities*, Kaiser-Hill Company L.L.C. a Closure Description Document was submitted for this unit (Unit 13) in Building 884.

This letter documents the summary report containing a description of the major closure activities and a declaration that the requirements of the RSOP have been fulfilled.

If you have any questions, please contact Stephen Nesta of Kaiser-Hill Remediation Industrial D&D, Site Services (RISS) at 303-966-6386.

Stephen M. Nesta 1/29/03
Stephen Nesta Date

Environmental Manager
Remediation, Industrial D&D, & Site Services

MVP:pvt

Attachment:
As Stated

cc:
J. Hindman - CDPHE
D. Kruchek - CDPHE
S. Tower - DOE, RFFO
S. MacLeod - DOE, RFFO
R. DiSalvo - DOE, RFFO

SEP 2003
RISS

Summary Report for Closure of RCRA Unit 13 in Building 884

U.S. Department of Energy

Rocky Flats Environmental Technology Site

EPA ID No. CO7890010526

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1.0 PURPOSE

This Summary Report pertains to RCRA closure activities for Unit 13 in Building 884. This report contains a description of major closure activities and any deviation from those stated in the Closure Description Document and other relevant information.

2.0 DESCRIPTION OF MAJOR CLOSURE ACTIVITIES

Closure activities were conducted under Building 884 Demolition Plan dated 1/2/03. A deviation from the CDD, which was to close by removal, was necessary. However, due to the lack of records being available, the Unit was closed under a "modified debris treatment" of the floor as agreed to by James Hindman (Attachment 1). The concrete floor was rinsed and inspected (Attachment 2). The concrete waste was removed as solid waste and disposed of in a local landfill (Attachment 3).

All waste packages were removed from the unit in October, 2002. The unit was inspected and determined to be a Type 1 building, per RFCA (Attachment 4).

3.0 SUMMARY

The modified requirements agreed to with James Hindman have been fulfilled. The concrete pad was demolished and shipped as sanitary waste.

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: 12/17/2002/ 10:00 am

Site Contact(s): Steve Nesta/ Kim Myers
Phone: 303-966-6386/ 303-966-7106

Regulatory Contact: James Hindman
Phone: 303-692-3345

Agency: CDPHE

Purpose of Contact: Discuss closure option for RCRA Unit 13 (B884) and the results of rinsates from Unit 15 (Tent 8 & 9 and the secondary containment pans of the cargoes)

Discussion

Unit 13 → B 884

James Hindman requested the records for RCRA Unit 13 for his review and concurrence on RISS project's approach for clean closing the RCRA Unit 13. On 12/17/02 Mr. Hindman was provided the inspection records for RCRA Unit 13 from March of 1992 through October of 2002. Three years of records (1989 through February 1992) were not in the RCRA operating record for review. Later on 12/17/02, in a conversation between Mr. Hindman and Kim Myers, James indicated that he did not feel comfortable approving the clean closure option, as outlined in the RSOP Notification Letter submitted by the RISS project, with three years of missing records. As resolution, James agreed to a "modified debris treatment" of the floor of Unit 13. RISS will rinse the floor with Mariko and water and the RISS Environmental Compliance group will conduct a visual inspection to confirm and document a clean surface. The concrete floor will then be disposed of as solid waste at a municipal waste landfill.

Unit 15

On 12/17/02, the analytical results from the rinsing of the Tents 8 and 9 floors and the secondary containment pans for the cargo containers were provided to James Hindman for review. After reviewing the results, James agreed that the pad under Tents 8 and 9 was not contaminated, that the tent structures could be removed, with the pad remaining in place until ER can perform the required soil sampling. When ER has performed the required sampling and determined any remediation needs, the pad will be removed and managed as solid waste at a municipal waste landfill. The secondary containment pans from the cargo containers, based on the radiological release, will be disposed of as solid waste at a municipal waste landfill.

Contact Record 4/10/00
Rev. 10/11/00

Contact Record Prepared By: Kim Myers

Required Distribution:

R. DiSalvo, RFFO
S. MacCleod, RFFO
J. Legare, RFFO
N. Newell, CDPHE
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R. Lietner, K-H 371
C. Deck, K-H
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S. Nesta, K-H RISS

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D. Shelton, K-H
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J. Mead, K-H ESS

Additional Distribution:

J. Hindman, CDPHE
S. Tower, RFFO
P. Swenson, K-H RISS
CERCLA AR

Nesta, Stephen

From: Myers, Kim
Sent: Wednesday, January 22, 2003 8:59 AM
To: VanDerPoel, Melissa
Subject: FW: Building 884/Unit 13

Melissa,
here is internal email documenting inspection of 884 after rinsing.

-----Original Message-----

From: Myers, Kim
Sent: Thursday, December 26, 2002 4:28 PM
To: Swenson, Peter
Cc: Nesta, Stephen; Wiemelt, Karen
Subject: Building 884/Unit 13

On 12/26/2002, I conducted an inspection of the floor of Unit 13, after it had been washed (on 12/24/02), in accordance with the closure performance standard for a "clean debris surface." This is defined as "a surface that, when viewed without magnification, shall be free of all visible contaminated soil or hazardous waste except that residual staining from soil and waste consisting of light shadows, slight streaks, or minor discolorations, and soil and waste in cracks, crevices, and pits may be present provided that such staining and soil and waste in cracks, crevices, and pits is limited to no more than 5% of each square inch of surface area."

Based on the inspection the closure performance standard was met, and the floor is considered non-hazardous solid waste debris which will be removed and disposed of as non-hazardous debris.

*Kim Myers - RISS Environmental
Rocky Flats Environmental Technology Site
X7106/212-1836*

Section A. Facility Data

Facility No.	Building 884 – Permitted RCRA Unit 13
Facility Descriptor:	Mixed Waste Storage Area
Project:	RISS D&D; Group 13 Closure Project
Date of Demolition:	1/2/03
Additional Information:	Building 884 was a single-story, single-room structure of non-insulated corrugated metal mounted on a steel frame. The building was built on a concrete slab. No water or sanitary utilities existed in the building. The structure was demolished and the construction debris landfilled. Building 884 was RCRA Unit 13. This unit has now been closed by removal.

(Must include information on environmental releases and conditions of site at turnover to Environmental Restoration)

Section B. Final Characterization Data

Reconnaissance Level Characterization Report (concurrence received)	Reconnaissance Level Characterization Report (RCLR/Pre-Demolition Survey Report (PDSR) for Building 884 - Concurrence, Steven H. Gunderson to Joseph A. Legare, dated December 11, 2002, attached.
In-process Characterization	N/A
Pre-Demolition Survey Report (approval received)	N/A
Post-Demolition Survey Report (as necessary)	N/A

Section C. Waste Data (complete categories as appropriate)**Sanitary Disposal**

Disposal Site:	Front Range Landfill, Erie, Colorado
Waste Volume (m³):	440 cubic yards
Waste Weight (tons):	267.78 tons
Additional Information:	Concrete from pad demolition; metal and wood from superstructure

Hazardous Disposal

Disposal Site:	Kettleman Hills Facility, Kettleman City, CA or Bethlehem Apparatus Co., Hellertown, PA
Waste Volume (m³):	Minor amounts
Additional Information:	Electronic circuit boards, exit signs, batteries, fluorescent light bulbs and any other RCRA hazardous components were removed and taken to the RFCA temporary unit for combination with like waste streams for disposal.

TSCA Waste Disposal

Disposal Site:	Superior Special Services, Phoenix, AZ
Waste Volume (m³):	Minor amounts
Additional Information:	PCB ballasts were removed and taken to the RFCA temporary unit for combination with like waste streams for disposal.

Asbestos Waste Disposal

Disposal Site:	
Waste Volume (m³):	N/A
Additional Information:	

Low-Level Waste Disposal

Disposal Site:	
Waste Volume (m³):	N/A
Additional Information:	

Low-Level Mixed Waste Disposal

Disposal Site:	
Waste Volume (m³):	N/A
Additional Information:	

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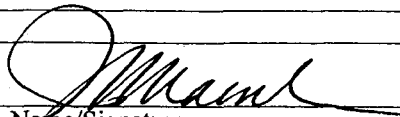
Facility B884 Closeout Report

Attachment 3
SMN-006-03
Page 2 of 2

Recycled Material	
Recycle Facility:	N/A
Waste Volume (m ³):	
Additional Information:	
Property Disposition	
Receiver Locations (<i>major items only</i>):	
Volume (m ³):	N/A
Weight (tons):	
Additional Information:	

Section D. Approvals

Kaiser-Hill Project Manager


Name/Signature

1/27/03

Date

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STATE OF COLORADO

Bill Owens, Governor
Douglas H. Benevento, Acting Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S. Laboratory and Radiation Services Division
Denver, Colorado 80246-1530 3103 Lowry Blvd.
Phone (303) 692-2000 Denver, Colorado 80230-6928
TDD Line (303) 691-7700 (303) 692-3090
Located in Glendale, Colorado
<http://www.cdphe.state.co.us>



Colorado Department
of Public Health
and Environment

December 30, 2002

Mr. Joseph A. Legare, Assistant Manager
Environment and Stewardship
U.S. Department of Energy, RFFO
10808 Highway 93, Unit A
Golden, CO 80403-8200

RE: Notification by Rocky Flats Environmental Technology Site (RFETS) to invoke the *Rocky Flats Cleanup Agreement Standard Operating Protocol (RSOP) for Facility Component Removal, Size Reduction, and Decontamination Activities* for Closure of Permitted RCRA Container Storage Unit 13 in Building 884

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division (the "Division") has reviewed your November 21, 2002 letter and the accompanying notification package received on November 29, 2002, notifying us of your intent to utilize the *RSOP for Facility Component Removal, Size Reduction, and Decontamination Activities* (the "Component RSOP") for the closure of permitted Container Storage Unit 13 located in Building 884. The notification stated that RFETS intended to close Unit 13 in Building 884 by application of "Clean Closure Option 1" from Section 5.0 of the Component RSOP. "Clean Closure Option 1" refers to a closure method described in Section 5.1.1 of the Component RSOP whereby a RCRA unit is closed by documenting the absence of RCRA contamination. However, as stated in Section 5.1.1, "Clean Closure Option 1" can only be applied to "... container storage units having a complete operating history, ...". On December 13 and 20, 2002, the Division reviewed portions of the operating record for RCRA Unit 13, primarily weekly inspection records prepared by the facility. Based on this review, the Division determined that the operating record for RCRA Unit 13 was not complete since inspection records for approximately three years (from 1989 through February 1992) were not available. Thus, the Division determined that "Clean Closure Option 1" could not be applied to RCRA Unit 13 in Building 884.

As stated in a December 17, 2002 RFETS Regulatory Contact Record prepared by Kaiser-Hill (see attachment) the question of how to close Unit 13 was resolved by a verbal agreement that the concrete pad in Building 884 would be washed in accordance with an appropriate method described in Table 1 - "Alternative Treatment Standards for Hazardous Debris" of Section 268.45 of the Colorado Hazardous Waste Regulations (6 CCR 1007-3). The concrete pad will subsequently be visually inspected in

accordance with 6 CCR 1007-3, Section 268.45 and if it meets the "Clean Debris Surface" criteria described therein, then the concrete pad will be removed and disposed of as solid waste at an appropriate off-site disposal facility. Otherwise, the concrete pad will be disposed of as hazardous waste at a permitted off-site hazardous waste disposal facility. The spent wash solution must be adequately characterized and disposed of properly. The Division has determined that this approach to close Unit 13 is appropriate since primarily non-liquid wastes have been stored in the unit, and an impermeable coating has been maintained on the surface of the concrete pad in Building 884 throughout the period that the unit has been RCRA-regulated, as stated in the Component RSOP notification. If you have any questions regarding this matter please contact James Hindman at (303) 692-3345.

Sincerely,



Steven H. Gunderson
RFCA Project Coordinator

Attachment

cc: S. MacLeod, DOE-RFFO
S. Tower, DOE-RFFO
~~John K. H. RISS~~
D. Shelton, Kaiser-Hill
T. Rehder, EPA Region VIII
D. Miller, AGO
D. Kruchek, CDPHE
J. Schieffelin, CDPHE
RFETS Administrative Records, Building T130G

10/10